

[Parties and Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

This Document Relates To:

*Breathitt County Board of Education v. Meta  
Platforms, Inc., et al.*

*Tucson Unified School District v. Meta Platforms,  
Inc., et al.*

*Charleston County School District v. Meta  
Platforms, Inc., et al.*

*Irvington Public Schools v. Meta Platforms, Inc., et  
al.*

*Dekalb County School District v. Meta Platforms,  
Inc., et al.*

*Board of Education of Harford County v. Meta  
Platforms, Inc., et al.*

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**STIPULATION AND [PROPOSED]  
ORDER TO REMOVE INCORRECTLY  
FILED DOCUMENT**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026

Time: 8:00 AM

Place: Courtroom 1, 4th Floor

1 The School District Plaintiffs and the YouTube Defendants hereby agree that ECF No. 2398-17  
2 should be temporarily sealed. ECF No. 2398-17 is Exhibit 1117 to the School District Plaintiffs' Omnibus  
3 Opposition to Defendants' Motions for Summary Judgment. Pursuant to the School District Plaintiffs'  
4 Temporary Sealing Motion, this document should have been filed temporarily under seal, as it contains  
5 information that one of the Defendants (in this case YouTube) may consider to be confidential. However,  
6 due to clerical error, this document was inadvertently filed on the public docket.

7 The YouTube Defendants alerted the School District Plaintiffs to this error over the weekend and  
8 the School District Plaintiffs took prompt action to remedy the error, including through the steps outlined  
9 on the Northern District of California's "CM/ECF Support and Troubleshooting" website. The document  
10 has been temporarily locked by the Court's ECF Clerk pending the Court's entry of this proposed order.

11 In light of the error, the parties respectfully ask that the document at ECF No. 2398-17 be  
12 temporarily sealed pending any agreement by the parties to unseal it, in whole or in part, or pending the  
13 outcome of the parties' forthcoming omnibus sealing motion pursuant to the Court's Sealing Procedures,  
14 set forth at ECF No. 341.

15  
16 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

17  
18 DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. YVONNE GONZALEZ ROGERS  
UNITED STATES DISTRICT JUDGE

21 Respectfully submitted,

22 Date: November 10, 2025

By: /s/ Previn Warren  
PREVIN WARREN  
MOTLEY RICE LLC  
401 9th Street NW Suite 630  
Washington DC 20004  
Telephone: 202-386-9610  
pwarren@motleyrice.com

27 LEXI J. HAZAM  
LIEFF CABRASER HEIMANN &  
28 BERNSTEIN, LLP

275 BATTERY STREET, 29TH FLOOR  
SAN FRANCISCO, CA 94111-3339  
Telephone: 415-956-1000  
lhazam@lchb.com

*Co-Lead Counsel*

/s/ Ashley W. Hardin

**WILLIAMS & CONNOLLY LLP**

JOSEPH G. PETROSINELLI, *pro hac vice*  
jpetrosinelli@wc.com

ASHLEY W. HARDIN, *pro hac vice*  
ahardin@wc.com

J. ANDREW KEYES, *pro hac vice*  
akeyes@wc.com

NEELUM J. WADHWANI (SBN 247948)  
nwadhwani@wc.com

680 Maine Avenue, SW  
Washington, DC 20024

Tel.: (202) 434-5000

*Attorneys for Defendants YouTube, LLC and Google LLC*

**FILER'S ATTESTATION**

I, Previn Warren, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: November 10, 2025

By: /s/ Previn Warren